



June 8th 2017

Ms. Shelly Smith
Strategic Planning Director
Housing Authority of New Orleans
4100 Touro Street
New Orleans, LA 70122

Re: Housing Authority of New Orleans Agency Plans

Ms. Smith,

The Greater New Orleans Housing Alliance (GNOHA) is a collaborative of non-profit housing builders and community development corporations working to rebuild the housing stock available in the city of New Orleans. The collaborative advocates for the preservation and production of affordable housing for people within the Greater New Orleans metropolitan region and places a special emphasis on the needs of the most vulnerable in society—seniors, people with disabilities, veterans, low-wage workers and low-income families.

GNOHA works closely with HousingNOLA and the implementation of the *HousingNOLA 10 Year Strategy and Implementation Plan*, which offers a road map to maximize the effectiveness of scarce government resources, increasing non-traditional resources, and assisting private sector investors in making strategic choices. *HousingNOLA* also offers a data framework to inform future housing policy, as well as shared leadership and engagement towards more thoughtful and scalable housing developments that are affordable for all income levels.

GNOHA's Policy Committee, along with HousingNOLA, seeks to work closely with HANO Staff and Board to achieve better housing policies and practices in the fiscal year to come. Below are our comments to the Housing Authority of New Orleans' Public Housing Agency Plans.

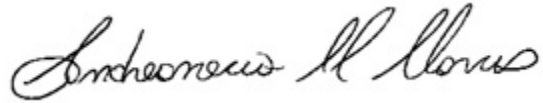
- 1. Deconcentration of Housing Choice Vouchers** We applaud HANO for its efforts in working with the City on its Assessment of Fair Housing Plan, and being the first jurisdiction to have its plan approved by HUD. The goals and priorities set out in the AFH Plan present a vision for addressing long-standing disparities in access to housing and housing standards among the citizens of New Orleans. We strongly support the stated priority to decrease the percentage of Housing Choice Vouchers (HCV) in racially/ethnically-concentrated areas of poverty (R/ECAPs) by taking steps to increase landlord participation and HCV tenant mobility.

A Shared Initiative, Inc.
Alembic Community Development
Alliance for Affordable Energy
Asakura Robinson Company
Broadmoor Improvement Association
Committee for a Better New Orleans
Crescent City Community Land Trust
Desire Community Housing Corporation
Dillard University
Enterprise Community Partners
Family Resources of New Orleans
Finance Authority of New Orleans
First NBC Bank
Foundation for Louisiana
GCR Inc.
Global Green USA
Greater New Orleans Foundation
Green Coast Enterprises
GNO Fair Housing Action Center
Greater New Orleans, Inc.
Gulf Coast Housing Partnership
Harmony Neighborhood Development
Home by Hand, Inc.
Housing Authority of New Orleans
Iberia Bank
Iris Development
Jane Place Neighborhood Sustainability Initiative
Jefferson Community Action Programs
Jericho Road Episcopal Housing Initiative
Jerusalem Economic Development Corp.
JPMorgan Chase Bank
LA Association of Affordable Housing Providers
Louisiana Appleseed
Louisiana Association of Nonprofit Orgs.
Louisiana Homebuyer Education Collaborative
Louisiana Housing Alliance
Louisiana Housing Corporation
Lower 9th Ward Homeownership Association
McCormack Baron Salazar
Neighborhood Development Foundation
Neighborhood Housing Services
New Day Homeowner Services
New Orleans Area Habitat for Humanity
New Orleans Redevelopment Authority
Northshore Housing Initiative
Office of Housing Policy & Community Development
Perez, APC
Preservation Resource Center
Project Homecoming
Providence Community Housing
Puentes New Orleans
Rebuilding Together New Orleans
Redmellon
Renaissance Neighborhood Development Corporation
Renaissance Property Group
SBP
Service Providers and Professionals Assoc.
Spottswood CDC
St. John the Baptist Housing Authority
St. Roch Community Development Corporation
Tulane/Canal Neighborhood Development Corporation
Tulane City Center
United Way of Southeast Louisiana
University of New Orleans
Urban Focus
U.S. Department of Housing and Urban Development
Volunteers of America
Wells Fargo
Whitney Bank

2. **Mobility Strategies** The recent reorganization of the Housing Choice Voucher Program (HCVP) Department provides the opportunity for HANO to tackle this priority with a renewed purpose. We are encouraged that the Housing Choice Voucher Administrative Plan includes the objectives of recruiting more landlords into the program outside of R/ECAPs and informing tenants on the benefits of living outside of R/ECAPs. We ask HANO to take more proactive steps in both of these areas and develop more robust plans and policies to achieve these goals. GNOHA should be considered a partner and resource in these efforts.
3. **Language Accessibility** The HousingNOLA plan emphasizes the importance that minority populations are fully able to access housing resources and programs. We ask that HANO be more proactive in making the HCVP and other programs more accessible for residents for non-English speaking residents. Particularly, Spanish and Vietnamese translations of important HANO documents is key to achieving this goal.
4. **Occupancy by Police Officers** Public Housing Admissions and Continued Occupancy Policy provides that HANO will allow Police Officers to occupy one unit in any public housing community at restricted rents even if the Police Officer does not meet the income limitations of the property. This policy makes sense for the stated goal of increasing security, however we are concerned about giving up a rent-restricted unit given the high demand for affordable units. Given that all New Orleans public housing properties are mixed-income and have market-rate units on site, there is an opportunity to work with property managers to reserve a market-rate unit at restricted rents for police officers instead of a public housing unit. This would allow HANO to address its goal of increased security without taking away an income-restricted affordable unit from an eligible low-income household.
5. **Energy Efficient Utility Allowance** We ask that HANO include a plan to implement an Energy Efficient Utility Allowance PILOT for the upcoming year. This program will reward owners of Housing Choice Voucher rentals that are built to a superior level of energy efficiency, thus encouraging efficiency measures that would lower utility bills for renters. GNOHA has been in talks with HANO staff around this initiative, and we are confident that it will be implemented, and should thus be included in the Annual Plan.
6. **Inspections** GNOHA supports Southeast Louisiana Legal Services' comments regarding more education around compliance with Housing Quality Standards between inspections. At tenant contract signings/annual income recertifications, HANO should provide documents that inform tenants of their right to request a special inspection at any time.
7. **Terminations and Grievances** We are concerned that Signature Communities' third party owners and managers are subject to standards less comprehensive than those for HANO-owned properties. Public housing tenants living in third party-managed sites should have the same protections as public housing tenants living in HANO owned sites. GNOHA supports SLLS's submitted recommendations to HANO on this issue.

If you have any further questions regarding GNOHA's comments, please do not hesitate to contact me at 504-244-8301 or at amorris@gnoha.org.

Sincerely,

A handwritten signature in black ink, reading "Andreanecia Morris". The signature is written in a cursive, flowing style.

Andreanecia Morris
Chair/President, GNOHA Board of Governors
Executive Director, HousingNOLA